

1 RICHARD A. GAMMICK  
Washoe County District Attorney  
2 DAVID C. CREEKMAN  
Chief Deputy District Attorney  
3 Nevada State Bar Number 4580  
P. O. Box 30083  
4 Reno, NV 89520-3083  
(775) 337-5700  
5 ATTORNEYS FOR DEFENDANT

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 \* \* \*

9 LAUREN KETTELL,

10 Plaintiffs,

11 vs.

3:12-CV-00297-HDM-WGC

12 WASHOE COUNTY DEPUTY BRENT  
COSS,

**JOINT INTERIM STATUS REPORT**

13 Defendant.  
14 \_\_\_\_\_/

15  
16 Plaintiff, Lauren Kettell, and Defendant, Brent Coss, by  
17 and through the undersigned, herein submit their Joint Interim  
18 Status Report in this case. This Joint Interim Status Report is  
19 submitted in accord with a Joint Stipulated Discovery Plan and  
20 Scheduling Order in this case.

21 **I. Discovery Completed To-Date**

22 As of the date of this Joint Interim Status Report, both  
23 Plaintiff and Defendant provided initial disclosures, Plaintiff  
24 has served three Requests for Production of Documents and one  
25 set of Interrogatories on Defendant, and Defendant has answered  
26 those requests, with one exception for which the preparation of

1 a transcript is necessary, and is proceeding. Plaintiff has  
2 similarly responded to Defendant's first set of Interrogatories,  
3 with the exception of providing certain records, such records  
4 expected to be soon forthcoming. Defendant served Plaintiff  
5 with a second set of Interrogatories on February 14, 2013, with  
6 responses anticipated within the next month.

## 7 **II. Depositions**

8 As of the date of this Joint Interim Status Report,  
9 Plaintiff has deposed the Defendant, along with an additional  
10 seven witnesses. Plaintiff's deposition of the Defendant was  
11 not concluded, and is to be continued, by agreement of the  
12 parties, in either March or April of 2013. Additionally,  
13 Defendant intends to depose Plaintiff in March or April of 2013,  
14 along with another witness who should be identified in response  
15 to Defendant's second set of Interrogatories. This second  
16 witness deposition will likely occur out-of-town and its  
17 scheduling is to be determined.

## 18 **III. Expert Discovery**

19 As of the date of this Joint Interim Status Report, neither  
20 Plaintiff nor Defendant has provided initial expert disclosures.  
21 Defendant may wish to disclose an expert, depending upon  
22 Plaintiff's response to Defendant's second set of  
23 Interrogatories and any resulting deposition testimony.  
24 Defendant's intentions in this regard cannot as yet be  
25 determined.

26 ///

1 **IV. Discovery Completion Deadline**

2 At present, the Joint Stipulated Discovery Plan and  
3 Scheduling Order anticipates that discovery will be completed in  
4 this case by April 10, 2013. Counsel for the Defendant now  
5 believes that such a completion deadline was too ambitious, as  
6 further discovery may hinge upon Defendant's yet-to-be-produced  
7 discovery (i.e., the earlier described transcript under  
8 preparation), on Plaintiff's yet-to-be-produced medical records,  
9 and Plaintiff's response to Defendant's second set of  
10 interrogatories. As such, it is now anticipated that either a  
11 motion or stipulation to extend discovery will be filed with the  
12 Court before the expiration of the deadline for doing so, such  
13 deadline now set for March 29, 2013.

14 Dated: February 20, 2013.

Dated: February 20, 2013.

15 RICHARD A. GAMMICK  
16 District Attorney

17 /S/ TERRI KEYSER-COOPER  
18 TERRI KEYSER-COOPER, ESQ.  
ATTORNEY FOR PLAINTIFF

By: /S/ DAVID C. CREEKMAN  
DAVID C. CREEKMAN  
Chief Deputy District Attorney  
ATTORNEYS FOR DEFENDANT